REMARKS

This response is intended as a full and complete response to the final Office Action mailed November 21, 2006. Claims 16-23, 34, and 35 are currently pending. By this response, Applicants have herein amended claims 16, 18, and 34. Claim 19 is hereby cancelled.

In view of the foregoing amendments and the following discussion, Applicants believe that all of the claims are allowable. It is to be understood that Applicants do not acquiesce to the Examiner's characterizations of the art of record or to Applicants' subject matter recited in the pending claims. Further, Applicants are not acquiescing to the Examiner's statements as to the applicability of the art of record to the pending claims by filing the instant response including amendments.

REJECTION UNDER 35 U.S.C. §102

Claims 16-23

The Examiner rejected claims 16 – 23 and 34 – 35 under 35 U.S.C. §102(e) as being anticipated by Gordon et al. (U.S. Patent No. 6,208,335, hereinafter "Gordon"). Applicants respectfully traverse the rejection.

In general, Gordon teaches a method for providing a menu structure for an interactive information distribution system. The menu structure is implemented using a navigator and a set top terminal that provides functionality for the navigator, as well as a video session manager that provides support functionality for the set top terminal. The menu structure has each menu (e.g., menu instructions, graphics, and video) contained in downloadable applets which are sent, upon request, from service provider equipment to a set top terminal for display on the set top terminal. (Gordon, Abstract).

Gordon, however, fails to teach or suggest each and every limitation of Applicants' claim 16. Namely, Gordon fails to teach or suggest at least the limitation of "wherein the selected object is located at the edge of the first frame in the requested direction if the requested direction matches an edge of frame indicator associated with the selected object," as claimed in Applicants' claim 16.

As claimed in Applicants' claim 16, a navigation command initiated from a remote control is received by a cable headend. The navigation command is associated with a selected object in a first frame and includes a requested direction which is in a direction from the selected object toward a second object adjacent to the selected object. The second object may be located within the first frame, or a second frame different than the first frame. A determination is made as to whether the selected object is located at an edge of the first frame in the requested direction. The selected object is located at the edge of the first frame in the requested direction if the requested direction matches an edge of frame indicator associated with the selected object. If the selected object is not located at an edge of the first frame, navigation is provided from the selected object in the first frame to a second object in the first frame. If the selected object is located at an edge of the first frame, navigation is provided from the selected object in the first frame to a second object in a second frame.

By contrast, Gordon teaches that the function of the navigator is generated using navigator descriptor files. The navigator descriptor files are used as the basis for construction of all navigator applet screens. As taught in Gordon, a navigator descriptor file defines specific objects to be used, the physical locations of the objects on the navigator menu, and interactions of the objects with the user's remote control actions. The navigator descriptor files are written in an HTML like language syntax. The navigator descriptor file for building an applet having bitmap objects includes a number of different definition types. (Gordon, Col. 8, Lines 32 – 53).

Gordon, however, is devoid of any teaching or suggestion of an edge of frame indicator, much less a determination as to whether a selected object is located at an edge of a first frame in a requested direction using an edge of frame indicator associated with the selected object. Rather, Gordon merely teaches navigator descriptor files that can specify the physical location of an object on a navigator menu screen. As taught in Gordon, the physical location of an object on a navigator menu screen is specified using an x-y coordinate system, as seen in the example Navigator Descriptor File included within Gordon (See Gordon, Col. 9, Line 30 – Col. 12, Line 16). For example, for screen name LAZ, the physical location of the first defined region is X=88 and Y=398. (Gordon, Col. 9, Line 34).

A navigator descriptor file defining regions using physical locations which are specified by X-Y coordinates, as taught in Gordon, is not an edge of frame indicator associated with a selected object where the edge of frame indicator indicates that the selected object is located at the edge of a frame in a certain direction, as claimed in Applicants' claim 16. Gordon is devoid of any teaching or suggestion of any indicator, or any other information, which specifies the location of an object with respect to the edge of a frame in which the object is located. Therefore, Gordon fails to teach or suggest the limitation that "the selected object is located at the edge of the first frame in the requested direction if the requested direction matches an edge of frame indicator associated with the selected object," as claimed in Applicants' claim 16.

Furthermore, in the Office Action, the Examiner asserts that a specific portion of Gordon teaches Applicants' limitation of determining whether a selected object is located at an edge of a first frame in a requested direction using an edge of frame indicator associated with the selected object. The cited portion of Gordon, however, merely teaches that direction vectors produced by a user using a joystick of a remote control are interpreted in order to selectively highlight certain regions of a television screen. The cited portion of Gordon further teaches that when a desired selectable icon is highlighted, the user may depress a "select" key on the remote control in order to execute a function associated with the icon, such as retrieving additional information or changing the menu. Specifically, the cited portion of Gordon states:

> "Specifically, a joystick on the remote control selectively highlights certain pre-defined regions of the television screen. To perform such highlighting, a reference region is always highlighted when a menu is first displayed. From that reference region, direction vectors produced by the joystick are interpreted by the CPU to highlight a region lying in the direction in which the joystick was moved. When a desired selectable icon is highlighted, the subscriber depresses a "select" key on the remote that sends an infrared signal to an infrared receiver (a support circuit 216). This receiver sends the select command to the CPU for interpretation. The selected region is associated with a function. If the function is a request for specific information or a change in the menu, the processor formats the command and sends it to the back channel transmitter for transmission to the video session manager. If the command is a function that is handled locally such as volume control, the CPU implements the function within the set top terminal." (Gordon, Col. 6, Lines 39-54, Emphasis added).

As such, as described above, the cited portion of Gordon merely describes the use of a joystick and buttons of a remote control to navigate regions of a television screen and select an icon on the television screen in order to execute a function associated with the icon. The cited portion of Gordon is completely devoid of any teaching or suggestion of any frame or associated edge of the frame, much less objects located at one or more edges of a frame. Furthermore, the cited portion of Gordon is completely devoid of any teaching or suggestion that an edge of a frame is specified using an edge of frame indicator associated with a selected object. The cited portion of Gordon is completely devoid of any teaching or suggestion of any edge of frame indicator.

Thus, for at least the reasons discussed hereinabove, Applicants respectfully submit that Gordon fails to teach or suggest at least the limitation of "determining, by the cable headend, whether the selected object is located at an edge of the first frame in the requested direction, wherein the selected object is located at the edge of the first frame in the requested direction if the requested direction matches an edge of frame indicator associated with the selected object," as claimed in Applicants' claim 16. As such, Gordon fails to teach or suggest each and every limitations of Applicants' claim 16.

"Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim" (Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co., 730 F.2d 1452, 221 USPQ 481, 485 (Fed. Cir. 1984) (citing Connell v. Sears, Roebuck & Co., 722 F.2d 1542, 220 USPQ 193 (Fed. Cir. 1983)) (emphasis added). Gordon fails to disclose each and every element of the claimed invention, as arranged in the claim.

Thus, Applicants submit that independent claim 16 is not anticipated by Gordon and, therefore, is allowable under 35 U.S.C. §102. Furthermore, dependent claims 17 – 23 depend, directly or indirectly, from independent claim 16, and recite additional limitations thereof. As such, and for at least the same reasons discussed above with respect to claim 16, Applicants submit that these dependent claims also are not anticipated by Gordon and are allowable under 35 U.S.C. §102.

Therefore, Applicants respectfully request that the rejection be withdrawn.

Claims 34-35

The Examiner rejected claims 34 – 35 under 35 U.S.C. §102(e) as being anticipated by Gordon et al. (U.S. Patent No. 6,208,335, hereinafter "Gordon"). Applicants respectfully traverse the rejection.

In general, Gordon teaches a method for providing a menu structure for an interactive information distribution system. The menu structure is implemented using a navigator and a set top terminal that provides functionality for the navigator, as well as a video session manager that provides support functionality for the set top terminal. The menu structure has each menu (e.g., menu instructions, graphics, and video) contained in downloadable applets which are sent, upon request, from service provider equipment to a set top terminal for display on the set top terminal. (Gordon, Abstract).

Gordon, however, fails to teach or suggest each and every limitation of Applicants' claim 34. Namely, Gordon fails to teach or suggest at least the limitation of "initiating at least one additional navigation command in the requested direction when the selected object is at an edge of a server-side image map object to navigate out of the server-side image map object, the server-side image map comprising a plurality of navigable objects within a larger navigable object, the larger navigable object comprising one of the plurality of objects of the first frame," as claimed in Applicants' claim 34.

As claimed in Applicants' claim 34, a navigation command is initiated from a remote control associated with a set top box. The navigation command includes a requested direction and is associated with a selected object on a video image. The requested direction is in a direction from the selected object toward a second object adjacent to the selected object. The video image is presented on a display device associated with the set top box. The selected object is within a first frame on the video image. The first frame includes a plurality of objects. At least one of the objects in the first frame is a server-side image map object that includes a plurality of navigable objects within a larger navigable object. In other words, the larger navigable object is one of the objects of the first frame. When the selected object is at an edge of a server-

side image map, at least one additional navigation command is initiated in the requested direction object to navigate out of the server-side image map object.

In the Office Action, the Examiner cites Figure 3 of Gordon, asserting that the four quadrants of the menu are frames. Furthermore, the Examiner asserts that the menu options "To Find A Specific Movie" and "OnSet" are server-side image map objects. Applicants respectfully submit, however, that the display of Figure 3 of Gordon does not meet the limitations of Applicants' claim 34. Applicants' claim 34 includes a limitation that a frame includes a plurality of objects where one of those objects is a server-side image map object which includes a plurality of navigable objects. The "To Find A Specific Movie" and "OnSet" menu options of Gordon, however, are not objects within a larger navigable object within a frame. The "To Find A Specific Movie" and "OnSet" menu options are merely individual objects displayed on a screen, not objects included within a larger navigable object.

Furthermore, even assuming that the Examiner interprets menu display 300 of Figure 3 of Gordon as an object (although Applicants respectfully submit that menu display 300 is not an object as claimed in Applicants' claim 34), although the "To Find A Specific Movie" and "OnSet" menu options may be navigable objects within a larger navigable object, Gordon would still fail to teach or suggest a frame including a plurality of objects where one of the plurality of objects is the server-side image map including a plurality of navigable objects within a larger navigable object, as claimed in Applicants' claim 34. In other words, even reinterpretation of the menu display 300 of Figure 3 of Gordon fails to meet the limitations of Applicants' claim 34.

As such, Gordon fails to teach or suggest a server-side image map object. Thus, Gordon must also fail to teach or suggest navigating out of such a server-side image map object. Therefore, Gordon must fail to teach or suggest at least the limitation of "initiating at least one additional navigation command in the requested direction when the selected object is at an edge of a server-side image map object to navigate out of the server-side image map object," as claimed in Applicants' claim 34. As such, Gordon fails to teach or suggest each and every limitation of Applicants' claim 34, as arranged in the claim.

"Anticipation requires the presence in a single prior art reference disclosure of each and every element of the claimed invention, arranged as in the claim" (Lindemann Maschinenfabrik GmbH v. American Hoist & Derrick Co., 730 F.2d 1452, 221 USPQ 481, 485 (Fed. Cir. 1984) (citing Connell v. Sears, Roebuck & Co., 722 F.2d 1542, 220 USPQ 193 (Fed. Cir. 1983)) (emphasis added). Gordon fails to disclose each and every element of the claimed invention, as arranged in the claim.

Thus, Applicants submit that independent claim 34 is not anticipated by Gordon and, therefore, is allowable under 35 U.S.C. §102. Furthermore, dependent claim 35 depends from independent claim 34, and recites additional limitations thereof. As such, and for at least the same reasons discussed above with respect to claim 34, Applicants submit that this dependent claim is also not anticipated by Gordon and is allowable under 35 U.S.C. §102.

Therefore, Applicants respectfully request that the rejection be withdrawn.

CONCLUSION

For the foregoing reasons, Applicants respectfully request reconsideration and passage of the claims to allowance. If, however, the Examiner believes that there are any unresolved issues requiring adverse final action in any of the claims now pending in the application, it is requested that the Examiner telephone Michael Bentley or Eamon J. Wall, Esq. at (732) 530-9404 so that appropriate arrangements can be made for resolving such issues as expeditiously as possible.

Respectfully submitted,

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